

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

As representative of

THE COMMONWEALTH OF PUERTO
RICO, THE EMPLOYEE'S RETIREMENT
SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO,
AND THE PUERTO RICO PUBLIC
BUILDINGS AUTHORITY,

Debtors.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

REBUTTAL EXPERT WITNESS NOTICE

TO THE HONORABLE COURT:

COMES NOW creditor Suiza Dairy, Corp. ("Suiza"), through the undersigned counsel and, very respectfully state, alleges and pray:

1. Suiza informed that it intends to object to the confirmation of the Plan of Adjustment and participate in the discovery process.
2. The Order Establishing Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith, requires that parties intending to present a rebuttal expert witnesses should disclose the same on or before October 4th, 2021.
3. Suiza hereby informs the following rebuttal expert witness:

a. Expert Witness

i. Loenardo Giacchino

Dr. Giacchino will testify as to the incorrect distribution received and the correct amounts of Suizas Claim. For brevity's sake, Dr. Giacchino may also substitute Miss Ramirez as a witness regarding the actual distributions performed if allowed to do so.

* Subject to discovery and disclosures from the opposing parties, Suiza reserves the right to announce further expert testimony from Dr. Giacchino on the financial viability of the Plan of Adjustment.

As a rebuttal witness, and subject to discovery, Dr. Giacchino may testify as to how the Plan of Adjustment is not financially viable if the Court finds certain classes and/or claims non-dischargeable.

4. Suiza reserves the right to announce additional witnesses or to change the witness pending disclosures and discovery.

WHEREFORE, it is requested from this Honorable Court to take note of the above; and consider Suiza to have complied with the Order Establishing Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties in the case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on October 4th, 2021.

By: /s/ *Rafael A. González Valiente*
USDC NO. 225209

Godreau & González Law, LLC
PO Box 9024176
San Juan, PR 00902-4176
Telephone: 787-726-0077
rgv@g-glawpr.com

